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In the Matter of:

: UNITED STATES BANKRUPTCY
COURT DISTRICT OF NEW JERSEY

Agnes O. Hill

: HONORABLE VINCENT F. PAPALIA

CASE NO. 21-19692

Debtor

: CHAPTER 13

**OBJECTION TO APPLICATION FOR EARLY TERMINATION OF LOSS
MITIGATION PERIOD**

I, Russell L. Low, being of full age, hereby certify the following:

1. I represent the debtor, Agnes O. Hill, on this Chapter 13 Bankruptcy and am filing this objection on her behalf.
2. On October 11, 2022 a denial was received by the lender.
3. On October 31, 2022 an appeal was submitted via the DMM portal.
4. On November 14, 2022 a request was made to receive an update from the lender on the appeal that was made, however the lender has not responded yet.
5. On November 15, 2022 an Application for Early Termination of Loss Mitigation Period was entered by MidFirst Bank.
6. Attached as an *Exhibit* is a copy of the portal history.

7. In addition, the debtor is respectfully requesting to remain in the court's loss mitigation program until a loan modification is obtained.

I certify that the foregoing statements made by me are true.

Dated: November 18, 2022

/s/ Russell L. Low
Russell L. Low, Esq.
Attorney for Debtor